

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK

In Re:

GATES COMMUNITY CHAPEL
OF ROCHESTER, INC.
d/b/a FREEDOM VILLAGE,

Chapter 11
Case No. 90-21729

Debtor.

**AFFIDAVIT OF STEPS TAKEN TO RAISE
FUNDS TO COMPLETE PLAN PERFORMANCE**

STATE OF NEW YORK)
ss.:
COUNTY OF MONROE)

MATTHEW A. RYEN, after being duly sworn, deposes and states under penalty of perjury:

1. I am a Partner at the law firm of Lacy Katzen LLP, the attorneys for the Debtor in the above-referenced matter.
2. I make this Affidavit in connection with the report ordered by the Court in its Order dated July 28, 2011.
3. Our firm spent considerable time over the month of July attempting to obtain funds necessary for the Debtor to pay off its plan in bankruptcy.
4. Much of the time spent by our firm was spent in connection with the settlement of the Estate of Arden L. Reed and the associated trusts.

5. We have been working diligently to gather up assets of the Estate of Arden L. Reed and to obtain the authority of the Debtor to take hold of such assets and disburse them in accordance with Debtor's plan in its bankruptcy.

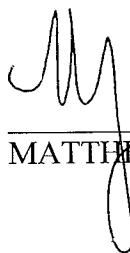
6. Much work was done over the past month in order to properly identify the parties who needed to be served in connection with the estate. It turns out that the decedent had more children than was first known to the Debtor and friends of the decedent. It was necessary to perform various work in connection with requests from the Surrogate's Court, which finally resulted in the Debtor being issued temporary letters of administration. These temporary letters will now allow for a thorough accounting of all assets of the Estate of Arden L. Reed and the gathering of such assets.

7. The Debtor is the beneficiary of an estate of another individual who passed in the State of North Carolina. That estate is represented by an attorney named Robert Green. Various discussions were held and assistance supplied to Mr. Green's office in order to help conclude the estate of which the Debtor is a beneficiary. In addition, the Debtor was able to conclude through our efforts that the total amount to be disbursed to the Debtor should be in the approximate sum of \$30,000 and should be available over the next 90 days.

8. Considerable time was also spent in connection with the possible sale of vacant real estate in Tioga County, New York. The Debtor is unable to put this vacant property to use at this time and believes that it is in the best interests of the bankruptcy estate to liquidate the property. Various inquiries were made to both realtors and individuals known to the Debtor's counsel in order to set up a plan for marketing the property.

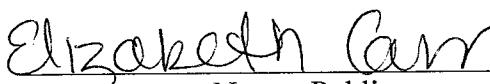
9. Your deponent has spent considerable time brainstorming various ways in which Debtor could raise funds in order to complete the Debtor's plan in the bankruptcy. The sale of

property is a primary effort at this time. The conclusion of the two estates is being pursued very vigorously and Debtor is pursuing its efforts to obtain funds from some of its more liquid donors in an effort to obtain enough funds to pay off the plan.

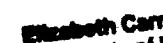

MATTHEW A. RYEN

Sworn to before me this

10 day of August, 2011.


Elizabeth Carr

Notary Public


Elizabeth Carr
Notary Public, State of New York
County of Monroe, Reg. No. 01CA6218258
Commission Expires March 1, 2014